

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT 1-4 Provide Verizon's current planning forecasts for the provision of cable television services in Massachusetts, and identify the technology to be used (i.e. - DSL, Fiber/Coax, Wireless).

REPLY: Verizon MA objects to this request on the grounds that the request is beyond the scope of this investigation and not reasonably calculated to lead to the discovery of admissible evidence.

VZ # 50

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT 1- Provide Verizon's current planning forecasts for the provision of DSL
5 services in Massachusetts.

REPLY: Please see the attached files. Attachment A includes a list of central offices where DSL is currently provisioned. Attachment B includes a list of central offices where DSL is currently planned, although subject to change. Verizon MA considers the information in Attachment B to be proprietary and confidential and will provide the information subject to the terms of a mutually acceptable protective agreement.

VZ # 51

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Allen Sovereign
Title: Group Manager - Capital Recovery

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT 1-7 Provide a list of projection lives and future net salvage percentages as currently prescribed for Verizon by the Massachusetts DTE. Also provide the relevant documentation that Verizon believes demonstrates that the DTE has prescribed those particular lives (i.e. - Commission Order, correspondence, etc.).

REPLY: The current Verizon projection lives and future net salvage percentages for Massachusetts are attached. These are also shown in the direct testimony of Verizon witness Sovereign filed on May 8, 2001 on exhibit AES-1. The Massachusetts DTE does not prescribe Verizon MA's depreciation lines.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert

Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT 1- Provide Verizon's current planning forecasts for ATM switch
8 deployment.

REPLY: At this time, there are no plans for ATM switch deployment in Verizon
Massachusetts.

VZ # 54

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert

Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT Specify whether Verizon's ATM deployment will be as an "overlay"
1-9 network, or will replace digital switches.

REPLY: Please see Verizon MA's response to Information Request ATT 1-8.

VZ # 55

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert

Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #1
DATED: May 8, 2001
ITEM: ATT 1-10 If Verizon anticipates that the deployment of ATM switching will displace any of its existing switches, identify those switching locations which will be displaced and their anticipated replacement date.
REPLY: Please see Verizon MA's response to Information Request ATT 1-8.

VZ # 56

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #1
DATED: May 8, 2001
ITEM: ATT 1-11 Provide Verizon's current planning forecast for SONET deployment.
REPLY: Verizon MA is unable to respond to this request because it is overly broad and vague. SONET encompasses a number of technical standards. Verizon MA deploys various types of network equipment based on the these standards.

VZ # 57

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT 1- Provide Verizon's current planning forecast for fiber in the distribution
12 network.

REPLY: Verizon has no planning forecast for fiber in the distribution network.

VZ # 58

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT 1- Provide copies of Verizon's 1990-2000 ARMIS 43-07 reports for
14 Massachusetts.

REPLY: Copies of the most current reports for 1991 through 2000 are provided, as requested. Verizon MA does not have a copy of the 1990 report. AT&T may obtain a copy from the FCC's Contract copier, International Transcription Service, Inc. In Washington, DC, or alternatively the data for 1990 is available on the FCC's ARMIS website at: <http://www.fcc.gov/ccb/armis/>

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Allen Sovereign
Title: Group Manager - Capital Recovery

REQUEST: AT&T Communications of New England, Inc., Set #1

DATED: May 8, 2001

ITEM: ATT 1- Provide a copy of the latest "Average Life Indications Based on Full
15 Mortality Study" for each account and subaccount.

REPLY: The latest average life indications were produced in the 1996 FCC study
referenced by AT&T witness Lee in his direct testimony, filed on May 8, 2001
on Attachment 6, and are publicly available at the FCC.